IN THE UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

ORANGEBURG DIVISION

5:25-cv-7045-SAL

Andrew McLaughlin,

Plaintiff.

(Formerly Case No. 2025-CP-38-00815)

V.

Carlton Reginald Lee and The Mahoney Group, Inc.,

Defendants.

LOCAL RULE 26.01 INTERROGATORY RESPONSES OF DEFENDANTS

TO: THE UNITED STATES DISTRICT COURT

Under the provisions of Local Rule 26.01, the Defendants respond to the Court's Rule 26.01 Interrogatories as follows:

State the full name, address, and telephone number of all persons or legal entities A. who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: The Defendants are not aware of any subrogation interest involved in this case.

As to each claim, state whether it should be tried jury or non-jury and why. В.

The Defendants assert that this case should be tried via jury as the ANSWER: claims are for personal injury resulting from the negligence of the Defendants.

C. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: No.

D. State the basis for asserting the claim in the division in which it was filed (or the

basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

ANSWER: The Plaintiff originally asserted his claim for relief in the Court of

Common Pleas of Orangeburg County, South Carolina. The motor vehicle accident giving

rise to this lawsuit occurred in Dillon County, South Carolina, which is within this division.

E. Is this action related in whole or in part to any other matter filed in this district,

whether civil or criminal? If so, provide (1) a short caption and the full case number of the related

action; (2) an explanation of how the matters are related; and (3) a statement of the status of the

related action. Counsel should disclose any cases that may be related regardless of whether they

are still pending. Whether cases are related such that they should be assigned to a single judge will

be determined by the clerk of court based on a determination of whether the cases arise from the

same or identical 24 transactions, happenings, or events; involve the identical parties or property;

or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: The Defendants are not aware of any related cases pending in the

District of South Carolina.

F. If the defendant is improperly identified, give the proper identification and state

whether counsel will accept service of an amended summons and pleading reflecting the correct

identification.

ANSWER:

The Defendants are properly identified.

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G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability. 26.02: Rules for Answering Court Interrogatories.

ANSWER: None at this time.

BREHMER LAW FIRM, LLC

By: <u>s/L. Darby Plexico</u>, <u>III</u>_

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<u>LDP@brehmerlawfirm.com</u> *Attorney for Defendants*

Columbia, South Carolina July 10, 2025